

THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

WILLIAM N. BERNARD and THE WILLAM N.
BERNARD AND CATHERINE H. BERNARD
REVOCABLE LIVING TRUST,

No. 16 CV 0863 (RMB)(BCM)

Plaintiffs,

- against -

NOTICE OF MOTION

LEONARD VINCENT LOMBARDO;
THE LVG HOLDING COMPANY D&L #1200 LLC;
THE LEONARDVINCENT GROUP, INC.;
BRIAN A. HUDLIN; DANIEL GAMBINO
and LOUIS M. LOMBARDI,

Defendants.

PLEASE TAKE NOTICE that, upon the attached Declaration of Edward Scarvalone, Esq., dated June 17, 2016, the Declaration of Ping C. Moy, dated June 3, 2016, together with exhibits attached to those declarations, the Judgment entered May 11, 2016, and the accompanying Memorandum of Law, plaintiffs William N. Bernard and The William N. Bernard and Catherine H. Bernard Living Trust (“plaintiffs”), through their undersigned counsel, will move this Court before the Honorable Richard M. Berman, at the Courthouse located at 500 Pearl Street, New York, New York, on a return date to be set by the Court, for an Order, pursuant to Fed. R. Civ. P. 64, 65 and 69, as well as New York CPLR §§ 5222, 5225 and 6201:

1. Requiring defendants Leonard Vincent Lombardo, The LVG Holding Company D&L #1200 LLC, The LeonardVincent Group, Inc. (collectively, the “LVG Defendants”), Brian A. Hudlin, and their transferees, co-conspirators and alter egos, to turn over to plaintiffs funds or property sufficient to pay the Judgment in full;
2. Restraining the LVG Defendants and their alter egos and transferees from transferring or selling any property or assets until they pay sums sufficient to satisfy the Judgment in full;
3. Attaching the LVG Defendants’ property; and

4. Awarding plaintiffs such other and further relief as this Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to the schedule ordered by the Court at the pre-motion conference held June 14, 2016, any opposing affidavits and answering memoranda must be served upon the undersigned no later than July 8, 2016.

Dated: New York, New York
June 17, 2016

Respectfully submitted,

WILLENS & SCARVALONE LLP
Counsel for Plaintiffs

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